

February 28, 2014

Mr. Ed Olson  
Minnesota Pollution Control Agency  
520 Lafayette Road  
St. Paul, Minnesota 55155

**Re: 2013 Annual Report  
East Hennepin Avenue Site, Minneapolis, Minnesota**

Dear Mr. Olson:

On behalf of General Mills, Inc., Barr Engineering Co. has prepared this letter report for the East Hennepin Avenue site located at 2010 East Hennepin Avenue in Minneapolis, Minnesota (the Site). This letter is submitted to MPCA pursuant to the requirements of the October 23, 1984 Response Order by Consent (the "Order") and summarizes investigation and removal action activities conducted at the Site during 2013. This letter constitutes the 2013 Annual Report as required by Order and the Remedial Action Plan.

The following provides a brief summary of investigation and removal action work conducted at the Site during 2013. Work performed in 2013 under MPCA oversight focused primarily on evaluation of the extent of potential migration of TCE in soil gas from General Mills' former facility at 2010 East Hennepin, and commencing sub-slab sampling and mitigation to prevent potential vapor intrusion into homes and buildings in the vicinity of the Site. This Annual Report includes only work conducted during 2013. The Sub-Slab Sampling and Building Mitigation Work Plan effort remains ongoing under MPCA oversight. Specifically, General Mills' activities in 2013 included the following:

**Vapor intrusion investigations**

- Phase 2C Vapor Intrusion Investigation – work was conducted in December 2012. This work was conducted pursuant to the Technical Memoranda submitted to MPCA on June 20, 2012 and approved by MPCA with modifications on December 2, 2012. This work included 11 direct push soil borings in right-of-way locations, and field screening of soil samples, and laboratory analysis of groundwater and soil gas samples. The results of this work were presented and summarized in a letter report dated April 19, 2013, and submitted to MPCA.
- Preliminary Phase 2D Vapor Intrusion Investigation – the preliminary round of sampling was conducted in June and July 2013. The purpose of this work was to verify that passive soil sampling as presented in work plan dated May 22, 2013, and approved by MPCA with modifications on June 10, 2013, was a viable technology for identifying areas of elevated TCE concentrations in soil gas. This investigation, which was conducted at MPCA's recommendation, showed that passive soil gas sampling appeared useful in identifying potential elevated levels of TCE in soil gas to depths of four feet below ground surface, but did not appear useful for

identifying potential elevated levels of TCE in soil gas at depths below four feet. This investigation included installation of 12 passive soil gas samplers at 11 locations. The results of this work were presented and summarized in a letter report to MPCA dated August 29, 2013.

- Phase 2E Vapor Intrusion Investigation – work was conducted in September 2013 pursuant to work plan dated August 29, 2013 and approved by MPCA on September 5, 2013. The purpose of this work was to further evaluate soil vapor conditions at the Site. This work included soil gas sampling at eight-foot depths at 26 locations and collection of groundwater samples from 10 of the 26 locations. The results of this investigation were presented and summarized in a letter report to MPCA dated November 11, 2013.
- Based on the results of the Vapor Intrusion Investigations, Barr Engineering on behalf of General Mills prepared and submitted a Sub-slab Sampling and Building Mitigation Work Plan to MPCA in November 2013 and a Quality Assurance Project Plan in December 2013. The objective of this work is to collect sub-slab soil gas samples beneath occupied buildings within the Study Area to identify properties with soil gas above 10 times MPCA's Intrusion Screening Value for TCE and provide mitigation systems to those properties. Sampling activities pursuant to these MPCA-approved plans commenced in mid-November 2013.

**Well sealing** – Eleven groundwater monitoring wells associated with the Site were sealed in August 2013, as approved by the MPCA. This work was planned in response to May 7, 2013 email communication from MPCA concurring with recommendations provided in the *2012 Annual Report* dated February 2013 (Annual Report) to permanently seal all Carimona Member monitoring wells and one Magnolia Member monitoring well. The work was completed as planned in the *2013 Monitoring Well Sealing* work plan dated August 8, 2013, and approved by Fred Campbell of the MPCA in an August 15, 2013 e-mail. A letter report summarizing the well sealing work dated February 27, 2014, was submitted to the MPCA.

**Pump-out system reporting** – The groundwater pump-out and treatment systems remained shut down in 2013. Submittal of quarterly “No Discharge” Discharge Monitoring Reports (DMRs) continued in 2013 under the National Pollutant Discharge Elimination System (NPDES) permit for the Site (MN0056022). The Minnesota Department of Natural Resources water appropriations permit is being maintained while the groundwater pump-out system is idle.

Please contact me at (952) 832-2877 or [sramsd@barr.com](mailto:sramsd@barr.com) with any questions on the information contained in this letter.

Sincerely,



Sara Ramsden, P.E.  
Project Manager

cc: Fred Campbell, MPCA  
Larry Deeney, General Mills